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8 *Boulder Ranch Master Association*
and Performance CAM, LLC

9 UNITED STATES DISTRICT COURT

10 DISTRICT OF NEVADA

11 PRESTON WOODBERRY, an individual;
12 COURTNEY SUMPTER, an individual,

13 Plaintiffs,

14 vs.

15 FIRST LIGHT HOMEOWNERS ASSOCIATION, a
16 Nevada domestic non-profit corporation; NICKLIN
17 PROPERTY MANAGEMENT & INVESTMENT,
18 INC., a Nevada domestic corporation; BOULDER
19 RANCH MASTER ASSOCIATION, a Nevada
domestic non-profit corporation; PERFORMANCE
CAM, LLC, a Nevada limited liability company;
LOUIS AUSTIN, an individual; ROGER EISEL, an
individual; DOES I through X, inclusive; and ROE
CORPORATIONS I through X, inclusive,

20 Defendants.

CASE NO. 2:14-cv-325-GMN-GWF

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22 **STIPULATION AND ORDER TO EXTEND DISPOSITIVE MOTION DEADLINE**

23 **(Second Request)**

24 The parties, by and through their respective attorneys, stipulate as follows:

25 1. On February 5, 2016, the court entered an order extending the dispositive motion
26 deadline to February 10, 2016. ECF No. 56. That was the parties' first request to extend the
27 dispositive motion deadline.

28 2. On February 10, 2016, while attempting to file Boulder Ranch Master

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1 Association's and Performance CAM, LLC's motion for summary judgment, counsel
2 experienced technical difficulties. Counsel's computer system shut down and was inaccessible
3 until February 11, 2016. This was unforeseeable and unexpected and rendered the motion for
4 summary judgment inaccessible.

5 3. Counsel contacted the attorneys for all parties on February 11, 2016 when access
6 to the system returned and explained what occurred.

7 4. The parties agree that this event constitutes an unforeseeable circumstance that
8 justifies a one-day extension of the dispositive motion deadline.

9 5. Boulder Ranch and Performance Cam have also shown excusable neglect for
10 seeking this extension after the deadline because the technical issue prevented them from
11 requesting the extension sooner.

12 6. There is also good cause to grant relief under the scheduling order because
13 counsel for Boulder Ranch and Performance Cam diligently sought an agreement from the
14 parties by contacting them within one day of the expiration of the deadline.

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7. Therefore, the parties agree that the dispositive motion deadline should be extended from February 10, 2016 to February 11, 2016 for Boulder Ranch and Performance Cam to file their motion for summary judgment.

<p>Dated: February 11, 2016.</p> <p>GORDON & REES LLP</p> <p><u>/s/ Ashlie Surur</u></p> <p>ROBERT S. LARSEN, ESQ. Nevada Bar No. 7785 ASHLIE L. SURUR, ESQ. Nevada Bar No. 11290 3770 Howard Hughes Parkway, Suite 100 Las Vegas, Nevada 89169 <i>Attorneys for Defendants Boulder Ranch Master Association and Performance CAM, LLC</i></p>	<p>Dated: February 11, 2016.</p> <p>CALLISTER & ASSOCIATES</p> <p><u>/s/ Matthew Q. Callister</u></p> <p>Matthew Q. Callister, Esq. Thomas N. Beckom, Esq. 823 Las Vegas Boulevard South, Fifth Floor Las Vegas, Nevada 89101 <i>Attorneys for Plaintiffs</i></p>
<p>Dated: February 11, 2016.</p> <p>LIPSON NEILSON COLE SELTZER & GARIN PC</p> <p><u>/s/ Angela Ochoa</u></p> <p>Joseph P. Garin, Esq. Angela T. Nakamura Ochoa, Esq. 9900 Covington Cross Drive, Suite 120 Las Vegas, Nevada 89144 <i>Attorneys for First Light HOA, Nicklin Property Management & Investment, Louis Austin and Roger Eisel</i></p>	<p>Dated: February 11, 2016.</p> <p>OLSON, CANNON, GORMLEY, ANGULO & STOBERSKI</p> <p><u>/s/ Daniela Labounty</u></p> <p>Michael E. Stoberski, Esq. Daniela Labounty, Esq. 9950 W. Cheyenne Avenue Las Vegas, Nevada 89129 <i>Attorneys for Defendants First Light Homeowners Association and Nicklin Property Management & Investment, Inc.</i></p>

ORDER

IT IS SO ORDERED.

Dated: February 12, 2016

George Foley Jr.
UNITED STATES MAGISTRATE JUDGE